

VIA ELECTRONIC COMMENT FILING SYSTEM

June 9, 2008

Marlene H. Dortch, Esq.

Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, DC 20554

Re: NOTICE OF *EX PARTE* CONTACT

Docket 03-123

Telecommunications Relay Service and Speech-to Speech

Services for Individuals with Hearing and Speech Disabilities

CG Docket No. 03-123

Dear Ms. Dortch,

On June 9, 2008, (1:30 PST) at the request of Scott Bergmann, from Commissioner Jonathan S. Adelstein's office, I called and spoke with Mr. Bergmann through a staff interpreter, to cover recent issues of concern related to the telephone numbering issue and made the following points:

1. Of prime importance for the purposes of E9-1-1 is the need for the Commission to enforce strict deadlines with regard to the established timeline, i.e., December 31, 2008, for full implementation of the numbering plan. Deaf, Hard of Hearing, and STS consumers cannot accept any further delays. Specifically, implementation of the numbering system and assignment of *real local geographically-based telephone numbers* to Deaf, Hard of Hearing, and STS consumers who use internet-based relay services must be completed by December 31, 2008 and that consumers must be able to call 9-1-1 through

their preferred provider which will be automatically routed to the appropriate public safety answering point by that time.

2. That all internet-based Relay Providers must be ready on or before December 2008, with their own internal systems enabled to issue telephone numbers to Deaf, Hard of Hearing, and STS consumers, and this readiness must include their ability to update consumers IP Addresses on an on-going, real-time basis, to the central numbering database. If the consumer who has a telephone number ports this number to another VRS provider, updates to the central database should continue to be made on a real time basis no matter which provider may be managing the consumer equipment. Of equal importance is that the central database should be linked to static URI's supporting the device or application. The concept is to move toward NG9-1-1 operations. Additionally, I expanded on the URI aspect of the system. URI allows for such features like caller ID, Video mail, call waiting, whereby to only use IP addresses, these features will not work. Important is a system that will allow for functional equivalence and therefore, any system established needs to require URI, and/or a clear plan to covert the IP addresses into a URI until the Providers are ready to move to a registered model. All of this should be outlined in the steps needed in the implementation's plan of action and ready with URI, by December 2008. The Commission must also ensure that the burden to update, connect, falls on the providers, not the Consumers while ensuring interoperability of equipment.
3. Furthermore, the Commission should rely on the technical expertise of Brian Rosen with NeuStar, and Justin Nelson with Dash. Both companies have similar proposals yet offer unique perspectives on infrastructure. The Commission should also examine related device issues, that are not Provider issued, but

“store-bought” to ensure there’s a handshake for interoperability, connectivity, and without any burden on the consumer to get a telephone number from their preferred provider. The Commission should please kill the “red herring” with regard to concerns expressed of late, related to the video device being able to connect with a provider of choice, especially if it’s a provider who did not issue any equipment. The record shows that this can be done and so it is not an issue. Period. Bottom line, the responsibility to ensure everything “works” must fall on the internet-based relay provider, not the consumer. It is the provider that must be prepared and fully ready, before it can issue telephone numbers to consumers. Security is also important to ensure consumers are protected but not to the point where this issue also becomes a red herring.

4. Last but not least, I thanked the Commissioner for all his support on this issue, and for his persistence with the time frames to be adhered to and strictly followed. I further commended Ms. Dana Shaffer, and her team from the Wireline Bureau as well as the team from CGB, Cathy Seidel and the Disability Rights Office. All of whom played a role to get the telephone numbering issue to become a reality for Deaf, Hard of Hearing, and STS Consumers.

Sincerely,

Sheri Farinha Mutti, CEO

NorCal Services for Deaf and Hard of Hearing

Sacramento, California

cc: Scott Bergmann, Commissioner Adelstein’s Office

Dana Shaffer, Chief, Wireline Competition Bureau

Cathy Seidel, Chief, Consumer and Governmental Affairs Bureau

